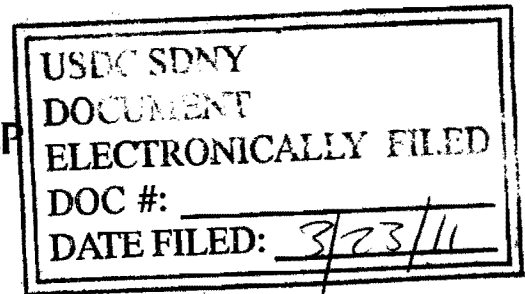


KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

601 Lexington Avenue,
New York, NY 10022-4811

212 446-4800

www.kirkland.com



Lee Ann Stevenson
To Call Writer Directly:
212 446-4917
lstevenson@kirkland.com

Facsimile:
212 446-4900
Dir. Fax: 212 446-4900

March 22, 2011

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: In re World Trade Center Lower Manhattan Disaster Site Litigation,
Case No. 21 MC 102 and 103 (AKH)

Dear Judge Hellerstein:

I write, reluctantly, to seek assistance with respect to payments due from certain of the defendants in the 21 MC 102 and 103 dockets. Pursuant to Your Honor's September 1, 2010, Order (Docket # 3844), Kirkland & Ellis LLP, as part of Defense Liaison Counsel, has remitted monthly payments to Professors Henderson and Twerski, as Special Masters, on behalf of defendants in the 102 and 103 dockets, and then invoiced each defense firm for its clients' pro rata share of those payments. The firms and defendants on the attached schedule have fallen into arrears (in fact, these defendants have not paid a single invoice). Though I am disinclined to burden the Court with this matter, efforts to contact these firms regarding payment have proven unsuccessful, and judicial relief appears necessary at this stage. I very much appreciate Your Honor's assistance in this matter.

Sincerely,

Lee Ann Stevenson

Attachment: Schedule A: Payments Owed

Cc: Counsel on Schedule A

The court will consider the relief requested, plus sanctions upon a proper motion or notice. In the meantime, defendants should consider their obligations to pay their fair share of defense costs.
3-23-11

Schedule A: Payments Owed

		07/2010	08/2010	09/2010	10/2010	11/2010	12/2010	01/2011	Total Due
Akerman Senterfitt LLP	60 HUDSON OWNER LLC	\$155.21	\$106.52	\$60.50	\$23.51	\$75.37	\$175.23	\$215.87	\$812.21
Jones Hirsch Connors & Bull PC	100 WALL STREET COMPANY LLC; 59 MAIDEN LANE ASSOCIATES, LLC	\$155.21	\$106.52	\$60.50	\$23.51	\$75.37	\$175.23	\$215.87	\$812.21
Law Offices of Michael E. Pressman	ALLRIGHT PARKING MANAGEMENT, INC.; CENTRAL PARKING SYSTEM OF NEW YORK, INC.; EDISON PARKING MANAGEMENT, L.P.	\$155.21	\$106.52	\$60.50	\$23.51	\$75.37	\$175.23	\$215.87	\$812.21
Lifflander & Reich LLP	NEW WATER STREET CORP.	\$155.21	\$106.52	\$60.50	\$23.51	\$75.37	\$175.23	\$215.87	\$812.21